

LAW OFFICES
PAULA J. NOTARI
152 W. 57th Street, Suite 800
New York, New York 10019
Tel. (646) 943-2172

March 19, 2018

The Hon. Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Jason Galanis et al.
16-cr-0371-4 (RA)

Dear Judge Abrams:

We represent Bevan Cooney, one of the defendants in the above-referenced case. We write to join the response arguments set forth in co-defendant Devon Archer's March 19, 2018 sur reply in further opposition to the Government's motion to invoke the crime fraud exception.¹

Dated: March 19, 2018
New York, New York

Respectfully submitted,

/s/ Paula Notari
The Law Office of Paula J. Notari
152 West 57th Street, 8th Floor
New York, New York 10019
Tel.: (646) 943-2172

Cc: (via ECF) AUSAs Brian Blain, Rebecca
Mermelstein, Aimee Hector, Negar Tekeii and
and Andrea Griswold

Abraham J. Hassen
O'NEILL / HASSEN
25 Eighth Ave, Suite C
Brooklyn, New York 11217

Attorneys for Bevan Cooney

¹ Mr. Archer filed an opposition to the Government's pre-trial motions on behalf of Mr. Cooney and all of the defendants who remain in this case. (Dkt. 310). We therefore join Mr. Archer's arguments that the Government has entirely failed to meet its burden to invoke the crime fraud doctrine for the reasons set forth therein. (Archer Opposition Br. Gov't Pre-Trial Motions at 2-23)